

EXHIBIT G.1

EXPERT REPORT OF ALON EVIATAR

SOKOLOV V. PALESTINIAN LIBERATION AUTHORITY, CASE NO. 04-397 (S.D.N.Y.)

I. INTRODUCTION

A. Credentials

I was born in 1967 and currently reside in Maccabim, Israel. I have an M.A. in Public Policy from Bar Ilan University (2011). I have a B.A. in Middle Eastern Studies and Political Science from Bar Ilan University (1994). I am fluent in Hebrew and Arabic and in English reading and comprehension.

Between 1986 and 1997, I served as an intelligence officer in the Intelligence Branch of the Israel Defense Forces (“IDF”), engaged in information gathering and analysis, with an expertise in military affairs.

Between 1998 and 2000, I served as an advisor on Palestinian Affairs in the Coordination and Liaison Administration in Nablus and Bethlehem. In 2000-2001, I studied at the IDF Command School. In the context of this course, I published a paper comparing the great Arab rebellion to the second intifada.

Between 2001 and 2004, I served as Commander of the Coordination and Liaison Administration in Jericho and the Jordan Valley. In this position, I managed communications with official and unofficial Palestinian sources in the region, the exercise of civil jurisdiction authority vis a vis the Palestinian Authority and the local population, the assessment of the situation in the region and provision of assistance to the security forces in fighting terror.

Between 2004 and 2013, I served as Head of the Department for Palestinian Affairs, at different times in Gaza and the West Bank, sometimes in the Civil Administration and sometimes in the Command for Coordination of Government Activities in the Territories (“COGAT”). During this period, I also participated in an intelligence course and I formed a special division dedicated to Hamas’s civilian infrastructure (the Dawa).

During the last nine years of my service in the IDF, I was a Department Head in the Department of Palestinian Affairs and held an IDF rank of Lt.Colonel. I reported to the Head of COGAT, above whom were only two people – the Minister of Defense and the Chief of Staff. In that position, I was responsible (among other things) for supervising the work of IDF research and assessment personnel in various fields relating to Palestinian affairs, drafting and presenting research and policy papers concerning Palestinian affairs, and appearing before and providing briefings to senior governmental and military forums regarding Palestinian affairs. I

included policemen in the Palestinian police forces or soldiers in the national forces or the security mechanisms that had also operated in coordination with Hamas.

13. Terrorist investigations during the al Aqsa intifada have revealed that there were terrorist attacks carried out through coordination by Hamas and Fatah operatives, as has been published in various freely available sources (as I shall explain in the following sections and I shall also specifically show that the attack on the campus cafeteria involved cooperation between Hamas and Fatah).

D. Abdullah Jamal Barghouti and the PA

1. The key terrorist in the bombing attack in the cafeteria at the Hebrew University is Abdullah Jamal Barghouti,⁹ who was arrested by Israel after a lengthy pursuit on March 7, 2003. Abdullah Barghouti had been wanted since August 2001.



2. Abdullah Jamal Barghouti is a Palestinian with Jordanian citizenship, born in Kuwait. He entered the territories of the West Bank in 1999, equipped with a visa to visit his relatives in the village of Beit Rima, near Ramallah. When the Intifada began, he looked for ways to participate in military activity. Initially, he attempted to join the al-Aqsa Martyrs' Brigades, the military arm of Fatah and after that, through his relative Bilal Barghouti, he enlisted in Hamas.¹⁰ As time passed, his status became established and he joined Hamas's military headquarters in the Ramallah area, which directed the activity of a number of armed cells and cells that carried out terrorist attacks, including suicide bombings.¹¹

⁹ For information about Abdullah Barghouti, see Guy Aviad, Lexicon of the Hamas Movement (Tel Aviv, Ministry of Defense 2008), pp. 60-61.

¹⁰ Abdullah Barghouti Statement, March 13, 2003.

¹¹ <http://www.ynet.co.il/articles/0,7340,L-2476913,00.html>.

3. Several days prior to the attack at the Sbarro Restaurant, and especially on the day of the attack, August 9, 2001, the Israel Security Authority was in possession of a warning of intent to carry out a suicide bombing in Jerusalem. The information centered on the name of Abdullah Barghouti, the Hamas bomb-maker.¹² Despite Israel's requests to the Palestinian Authority to act quickly in order to prevent the attack, members of the PA security forces arrested Abdullah Barghouti two hours before a suicide bomber exploded in the Sbarro Restaurant using a bomb which Barghouti had already built.
4. Bilal Barghouti, who was a relative of Abdullah and Abdullah's recruiter into Hamas and his contact person with Hamas headquarters and terrorist cells, was a key operative of Hamas in Ramallah. Bilal was arrested together with Abdullah Barghouti in Ramallah on August 9, 2001, at 11:00 a.m., about two hours before the suicide bomber Izz al-Din al-Masri carried out the suicide bombing at the Sbarro Café in Jerusalem. When Bilal was arrested, he was carrying a pistol and the will of Izz Al-Din Al-Masri.
5. Bilal Barghouti had previously been arrested on a number of occasions by the Palestinian Preventive Intelligence. Explosive materials were found in his home two times; the first time was when he was arrested, in May, and the second time was when he was arrested along with Abdullah Barghouti on August 9, 2001.¹³ In both cases, he was released a few days later after a superficial interview, despite being found in possession of weapons.
6. One of Abdullah Barghouti's sources for weapons was Ahmad Barghouti, a member of Fatah, the bodyguard of Marwan Barghouti and a PA police officer. In his statement to Israeli police, Abdullah Barghouti relates that he had purchased an Uzi,¹⁴ a Kalashnikov rifle, and a pistol¹⁵ from Ahmad Barghouti. Ahmad Barghouti provided a large quantity of explosives to Abdullah Barghouti.¹⁶

¹² See Brilliant, Joshua, Feature: Reporters Tour Battle Zone, United Press International, August 17, 2001; Roelofsma, Dirk Kinnane, Global Impact News Analysis, United Press International, August 17, 2001; Sale, Richard, Arafat Ignored CIA Warning, United Press International, August 17, 2001; Gilmore, Inigo, Israel Warned Arafat of Suicide Bomb Risk Officials Had Named the Mastermind of Last Week's Fatal Blast – But the Palestinians had Refused to Act, Sunday Telegraph, August 12, 2001; Brilliant, Joshua and Abu Ramadan, Saud, PA Police Arrests Suspected Bombers, United Press International, August 10, 2001.

¹³ (Abdullah Barghouti), Bates P7:131-146.

¹⁴ Abdullah Barghouti Statement, March 13, 2003.

¹⁵ (Abdullah Barghouti), Bates P7:131-146.

¹⁶ (Abdullah Barghouti), Bates P7:131-146 .

indicate unity of interests. The actors here are two senior Palestinian figures, one from Fatah and the other from Hamas. Marwan Barghouti, the head of Fatah, was well aware that Abdullah Barghouti was wanted, that he was a manufacturer and a sender of bombs and explosive devices. There was no need for such a senior Palestinian figure to hide a wanted person.

17. Ahmad Barghouti (a/k/a “Ahmad al-Faransi”), a PA police officer, worked as the driver and bodyguard for Marwan Barghouti. He belonged to the al-Aqsa Martyrs’ Brigade, the armed wing of Fatah and was a contact person between Marwan Barghouti and other operatives. Among other things, his functions included giving money to operatives and providing them with mobile phone handsets. He engaged in terrorism, including in initiation, planning, issue of arms and weaponry, including suicide bombings.²⁵
18. Ahmad Barghouti sheltered Abdullah Barghouti while it was known to him that he was wanted by Israel and was a key operative of Hamas.²⁶ Indeed, Ahmad admitted to, and was charged and convicted by Israel of, sheltering and aiding a criminal, on the basis of the fact that he provided a safehouse and a pistol to Abdullah Barghouti after Abdullah was released from PA custody.²⁷
19. Marwan Barghouti (of Fatah) and Hassan Yusef (a Hamas leader), who at that time were members of the National and Islamic Forces – the inter-factional entity that coordinated the struggle against Israel during the Intifada – visited Abdullah Barghouti in the Preventive Security Palestinian Prison. During the visit and while Marwan Barghouti and Hassan Yusef were present, Abdullah Barghouti was presented with a new mobile phone by an officer of PA Preventive Intelligence, Abu Ali Tarifi. From the Palestinian Authority prison and using the telephone that was given to him, Abdullah Barghouti contacted Aiman Halawa, the “engineer of explosives” of the Hamas organization in Nablus, and gave him the code words “The tomatoes are spoiled” and said that he had to come to Ramallah to take them. This was code language between the two that described the weapons that Aiman Halawa had delivered as not working properly. Barghouti states in his confession that Halawa understood this, and indeed, after he was released from prison and talked with Halawa, the latter stated that he had taken the weapons.²⁸

²⁵ See Ahmed Barghouti Amended Indictment, September 29, 2002; See Ahmed Barghouti Guilty Plea and Conviction, May 15, 2003.

²⁶ Abdullah Barghouti Statement, May 12, 2003.

²⁷ Id at Criminal Count 51

²⁸ Abdullah Barghouti Statement, May 15, 2003.

Ahmad Barghouti drove Abdullah Barghouti's relatives from the village of Beit Rima to Ramallah to visit Abdullah in the Palestinian prison. Ahmad Barghouti also purchased a new mobile phone for Abdullah Barghouti.²⁹

20. **In my expert opinion, based on my familiarity with Palestinian society, the trip that was made in Marwan Barghouti's Palestinian Authority car, to which he was entitled by virtue of his membership in the Legislative Council, was with the approval of Marwan Barghouti (the head of the Fatah Tanzim in the West Bank, member of the PA Legislative Council on behalf of Fatah and the most powerful Fatah man on the Palestinian street at that time in the entire West Bank. This personal gesture by Marwan Barghouti intimates a trusting and cooperative relationship between Hamas and Fatah and shows that they were working towards common goals. It further indicates that the PA did not respect and even disregarded the allegations against Abdullah Barghouti and treated his arrest and incarceration as a charade.**
21. As noted above, Abdullah Barghouti's release from prison by the PA was on August 27, 2001. He made the bomb which was used in the July 31, 2002 Hebrew University attack. Obviously, he would have been unable to do so, if the PA had not released him.

E. PA/PLO Material Support To Hamas Between September 2000 and July 2002

1. Muhammad Dahlan, the Head of the Preventive Intelligence Service in Gaza, stated during a January 22, 2006 broadcast that during the Second Intifada the PA sheltered Hamas' terrorist leadership, stating that: "All [Hamas'] military commanders have been protected by the [PA] security establishment throughout this Intifada. They were provided with full protection, and Israel has accused us of this several times, and so has the American administration. I was the prominent person to be accused of this." Likewise, in a June 16, 2007, television interview Dahlan stated that: "The Palestinian security forces were those who protected and hid half of the Hamas leadership and of the Hamas military force during the Intifada."
2. Hamas was also permitted by the PA to maintain and operate its entire civilian social and educational apparatus, known as "Dawa" (i.e. all the activities conducted by Hamas to indoctrinate the public with the ideology of Hamas in order to mobilize the people and to get their support and to use the Dawa as a source for recruiting terrorists) in PA territory. The goals of the Dawa are to appeal to all sections of Palestinian society from children to

²⁹ (Abdullah Barghouti), Bates P7:131-146 .